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**ATTORNEY FOR PLAINTIFF**  
**UNITED STATES OF AMERICA**

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF MONTANA**  
**GREAT FALLS DIVISION**

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**UNITED STATES OF AMERICA,**

**Plaintiff,**

**vs.**

**JAYCOB TYLER KUTZERA,**

**Defendant.**

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**CR 17-48-GF-BMM**

**NOTICE OF RULE 16**  
**DISCLOSURE:**  
**Detective Jim Woog**

Rule 16(a)(1)(G) requires the government to provide a written summary which “describe[s] the witness’s opinions, the bases and reasons for those opinions and the witness’s qualifications”. This case involves computer forensic analysis of digital media. While his testimony will be essentially factual in nature, the United States hereby provides the defendant with the following summary of Detective Jim Woog’s expected testimony pursuant to Fed. R. Crim. P. 16(a)(1)(G) and L.R. CR

16.3.

**A. Identification of All Documents or Other Information Reviewed By the Expert:**

Prior to conducting his analysis, Detective Woog examined a search warrant and the supporting affidavit issued by the Montana Eighth Judicial District Court.

**B. Summary of Results**

Detective Woog examined a computer and two HDDs that were seized as evidence in this case. He located video and image files that depicted child pornography on the computer. He also located relevant Internet History records and relevant search terms.

**C. Qualifications**

A copy of Detective Woog's resume is attached ("Exhibit A"). Briefly, Detective Woog is a Certified Computer Forensic Examiner employed by the Intermountain West Regional Computer Forensics Laboratory in Billings, Montana. He holds a Bachelor of Arts Degree in Criminal Justice from Saint Cloud State University, Saint Cloud, Minnesota. He has received extensive training in the area of Computer Forensics and has testified in federal and state district courts.

**D. Summary of Testimony**

In November 2016, Detective Woog began conducting an examination of Kutzera's Desktop Slimline computer, 3.5" Seagate HDD and 3.05" Seagate HDD.

He issued a written Report of Examination on December 19, 2016, which has been disclosed to the defendant. The results disc has also been made available to the defendant. His forensic examination and its results, along with his experience and expertise in computer forensics, form the basis of his testimony. His testimony will include all of the information and evidence set forth above in Section B, and further described in his written report and shown on his results' report.

Detective Woog will testify that he examined the evidence in this case and will explain his processes and procedures. He utilized a Wiebetech forensic UltraDock write blocker, XWays and Internet Evidence Finder to conduct his examination. His testimony will disclose that proper examination protocols were followed.

Detective Woog's testimony will also include describing the properties of each item he examined. He will describe what he located, how he located it, and all the data related to the information and files he determined were relevant to his examination. Detective Woog will testify about the Recycle Bin, Internet History, unallocated space, allocated space, file paths and folders, creation dates, and search terms. He will also testify about volume shadow copies and URLs.

Detective Woog will testify that he created reports and tables of files, records and data. He will explain that he copied the reports and tables to media that

accompanied his forensic report. He will also explain summary exhibits that were created, based on his analysis, for trial.

**E. Lay Testimony**

Other than as it relates to his basic technique, the steps that he took for his examination and his results, Detective Woog's testimony will not present other lay testimony relating to the underlying search or the defendant's interview.

DATED this 6th day of November, 2017.

KURT G. ALME  
United States Attorney

/s/ Cyndee L. Peterson  
Assistant U.S. Attorney  
Attorney for the Plaintiff